

STEVEN B. WOLFSON
 District Attorney
CIVIL DIVISION
 By: STEPHANIE BARKER
 Chief Deputy District Attorney
 State Bar No. 3176
 500 South Grand Central Pkwy.
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Attorney for the Clark County Treasurer

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EMMANOUIL VARAGIANNIS,
 (aka Manny Varagiannis),

Defendant.

Case No: 2:12-CR-439-PMP-PAL

VERIFIED PETITION TO ASSERT
 LEGAL INTEREST IN FORFEITED
 PROPERTY

COMES NOW the Clark County Treasurer, LAURA B. FITZPATRICK, by Clark County District Attorney Steven B. Wolfson, through Chief Deputy District Attorney Stephanie A. Barker, and hereby asserts a legal interest on behalf of Clark County for property taxes, penalties, interests and costs, along with any liens and interests the County may have due and owing on the property of which the United States of America is seeking forfeiture, in the above-captioned criminal action. This Petition is based upon the personal knowledge and the business records of the Clark County Treasurer.

I.

CLAIM/LEGAL INTEREST

1. That the Clark County Treasurer is an elected official in the County of Clark, State of Nevada.

2. That pursuant to Nev. Rev. Stat. 361.475, the Clark County Treasurer is vested with the legal obligation to collect property taxes assessed against real property located within the County of Clark, State of Nevada.

3. Clark County has a financial interest in the real property known as Assessor's Parcel Number 138-23-710-017 (the "subject real property") as described in the Notice of Forfeiture filed in the instant case on April 29, 2014.

4. That the Clark County Treasurer is informed and believes and therefore alleges that as of May 9, 2014, the total due and owing for property taxes, penalties, interests and costs is Two Thousand Twelve Dollars and sixty four cents (\$2,012.64). An authenticated, certified copy of the Clark County Treasurer's Property Account Inquiry is attached hereto as Exhibit "A."

5. That taxes, penalties, interests and costs, along with any special assessments and liens and interests that Clark County may have, will continue to accrue on a daily basis and the exact figure is unknown until a specific date of payment is determined.


II.

RELIEF SOUGHT

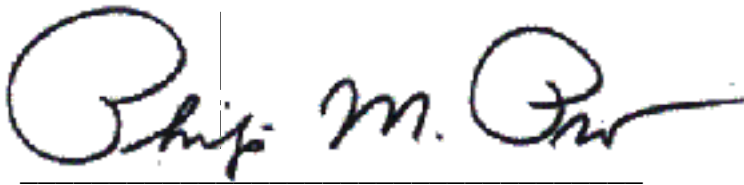
That the Clark County Treasurer be paid the full amount due and owing in taxes, penalties, interests and costs, along with any special assessments, liens and interest due and owing on and through the date of payment, from the proceeds of any forfeiture of the subject real property.

DATED this 13th day of June, 2014.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

By: 
STEPHANIE BARKER
Deputy District Attorney
State Bar No. 3176
500 South Grand Central Pkwy.
P. O. Box 552215
Las Vegas, Nevada 89155-2215
Attorney for the Clark County Treasurer

IT IS SO ORDERED:


A handwritten signature in black ink, appearing to read "Philip M. Pro". The signature is written in a cursive, flowing style with a large initial "P" and a long horizontal stroke at the end.

PHILIP M. PRO, U.S. District Judge
June 18, 2014


VERIFICATION

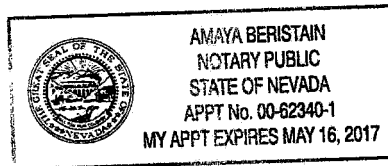
I, LAURA B. FITZPATRICK, being first duly sworn, hereby attest that I am the duly elected Clark County Treasurer, that I have read the foregoing Petition to Assert Legal Interest in Forfeited Property, that I have reviewed the Property Account Inquiry Summary Screen attached thereto as Exhibit A and verify that it is a true and accurate copy of a business record maintained in the ordinary course of business in the Office of the Clark County Treasurer, and that by my signature hereinbelow I verify the truth and accuracy of the representations in said Petition as of the date of my signature hereon.

DATED this 18th day of June, 2014.


LAURA B. FITZPATRICK
Clark County Treasurer

SUBSCRIBED AND SWORN
by LAURA B. FITZPATRICK
this 18 day of June, 2014.


NOTARY PUBLIC
in and for the County of Clark

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Clark County District Attorney and that on this 18th day of June, I served a true and correct copy of the foregoing **Verified Petition to Assert Legal Interest in Forfeited Property** through CM/ECF Electronic Filing system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

Daniel D. Hollingsworth
Attorney for Plaintiff
Daniel.hollingsworth@usdoj.gov

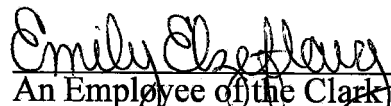

An Employee of the Clark County District
Attorney's Office – Civil Division

EXHIBIT “A”

**Clark County Treasurer's Office**

Laura B. Fitzpatrick, Treasurer
 500 S Grand Central Pky
 PO Box 551220
 Las Vegas NV 89155-1220
 (702) 455-4323
 www.clarkcountynv.gov/treasurer

Real Property and Special Tax Statement for Fiscal Year 2013-2014

UNITED STATES OF AMERICA
 %D HOLLINGSWORTH
 333 LAS VEGAS BLVD S #5000
 LAS VEGAS NV 89101

Parcel Number: 138-23-710-017

Tax District: 200 Tax Rate: 3.2782

Tax Cap %: 4.2

Location: 6225 BELLOTA DR

Assessor SIERRA OESTE PLAT BOOK 31 PAGE 18 LOT 17
 Description: BLOCK 1

Assessed Valuation for 2013-2014

Land	11,200
Building & Improvement	39,252
Personal Property	0
Assessed Value Subject to Cap	50,452
New Land Value**	0
New Improvement Value**	0
Personal Property Value**	0
Less Exemption	0
Net Assessed Value	50,452
New Construction Supplemental**	0

****Not Subject to Cap****Payment
Installments**

Description	Due Date	Original Amount	Amount Due
Installment 1	8/19/2013	\$543.63	\$543.63
Installment 2	10/7/2013	\$518.91	\$518.91
Installment 3	1/6/2014	\$487.90	\$487.90
Installment 4	3/3/2014	\$456.20	\$456.20
Costs	3/22/2014	\$6.00	\$6.00

Summary

Taxes as Assessed	\$1,653.92
Cap Reduction (if applicable)	\$0.00
Net Taxes	\$1,653.92
Other Charges	
Las Vegas Artesian Basin	\$0.98
Total Annual Charges	\$1,654.90

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT



Make checks payable to:

Fiscal Year 2013-2014

Clark County Treasurer's Office

Parcel Number: 138-23-710-017

Mail to:
 500 S Grand Central Pky
 PO Box 551220
 Las Vegas NV 89155-1220

Location: 6225 BELLOTA DR

Comment: Quote good until 06/30/14 ctb

Minimum Due: \$2,012.64

To Pay In Full: \$2,012.64

Enter Payment Amount

\$

1382371001714100002012644

I do hereby certify that this is a true copy
of the instrument now on record in the
Office of the Clark County Treasurer,

Laura B. Fitzpatrick, Clark County Treasurer

By 
Deputy Treasurer

Date 6.12.14



Clark County Treasurer's Office

Laura B. Fitzpatrick, Treasurer
 500 S Grand Central Pky
 PO Box 551220
 Las Vegas NV 89155-1220
 (702) 455-4323
www.clarkcountynv.gov/treasurer

Real Property and Special Tax Statement for Fiscal Year 2013-2014--Con't.

Parcel Number: 138-23-710-017

Distribution of Fiscal Year 2013-2014 Taxes

Distribution of Tax Dollars	Tax Rate	Taxes as Assessed	Cap Reduction	Net Taxes
COUNTY SCHOOL MAINTENANCE & OPERATION	0.7500	378.39	0.00	378.39
LAS VEGAS CITY	0.6765	341.31	0.00	341.31
COUNTY SCHOOL DEBT (BONDS)	0.5534	279.20	0.00	279.20
CLARK COUNTY GENERAL OPERATING	0.4470	225.52	0.00	225.52
LVMPD MANPOWER SUPPLEMENT LV	0.2800	141.26	0.00	141.26
STATE OF NEVADA	0.1700	85.77	0.00	85.77
MEDICAL ASST TO INDIGENT PERSONS	0.1000	50.45	0.00	50.45
LAS VEGAS CITY FIRE SAFETY	0.0950	47.93	0.00	47.93
LV/CLARK COUNTY LIBRARY	0.0942	47.52	0.00	47.52
CLARK COUNTY CAPITAL	0.0500	25.23	0.00	25.23
CLARK COUNTY FAMILY COURT	0.0192	9.69	0.00	9.69
INDIGENT ACCIDENT FUND	0.0150	7.57	0.00	7.57
CLARK COUNTY DEBT	0.0129	6.51	0.00	6.51
STATE COOPERATIVE EXTENSION	0.0100	5.05	0.00	5.05
LVMPD EMERGENCY 911	0.0050	2.52	0.00	2.52
LAS VEGAS CITY DEBT	0.0000	0.00	0.00	0.00
TAX DISTRIBUTION	3.2782	1,653.92	0.00	1,653.92

Detail of Amount Due

Year	Description	Total Tax Amt.	Balance Due
2014	Property Tax Principal	\$1,653.92	\$1,653.92
2014	Las Vegas Artesian Basin	\$0.98	\$0.98
2014	Property Tax Penalty	\$248.29	\$248.29
2014	Property Tax Interest	\$103.45	\$103.45
2014	Advertising Fee	\$4.00	\$4.00
2014	MAILING FEE	\$2.00	\$2.00
Total for Fiscal Tax Year 2014:		\$2,012.64	\$2,012.64
Total:		\$2,012.64	\$2,012.64

JUN 12 14 12:14 PM
CLARK COUNTY
CLERK

I do hereby certify that this is a true copy
of the instrument now on record in the
Office of the Clark County Treasurer,

Laura B. Fitzpatrick, Clark County Treasurer

By *Chadwick Baker*
Deputy Treasurer

Date 6-12-14